

**UNITED STATES DISTRICT COURT  
DISTRICT OF MAINE**

**MOTION TO ENLARGE TIME**  
**TO RESPOND TO PLAINTIFF'S COMPLAINT**

Pursuant to Rule 6(b)(1)(A) of the Federal Rules of Civil Procedure, Defendant St. Matthew's University, Inc. ("Defendant") moves the Court for a three-week extension to respond to Plaintiff Bryan Repetto's Complaint. The time for responding to the Complaint will expire on April 8, 2008 absent court order. The Complaint raises issues that, in the opinion of counsel, require further investigation. Defendant therefore requests three additional weeks to respond to the Complaint. If the Court grants the present motion, Defendant's response will be due on April 29, 2008. Plaintiff's counsel, Barbara Goodwin, has authorized the undersigned to represent that Plaintiff consents to this extension.

WHEREFORE Defendant moves the Court for an extension of time until April 29, 2008 to respond to Plaintiff's Complaint under Federal Rule of Civil Procedure 6(b)(1)(A).

Dated: April 7, 2008

Respectfully submitted,

/s/ Gail Elise Abbey

Christopher Silva (ME Bar No. 8934)  
Gail Elise Abbey (Of Counsel, CA Bar No. 248702)  
EDWARDS ANGELL PALMER & DODGE LLP  
111 Huntington Ave.  
Boston, MA 02199-7613  
Phone: 617.239.0100  
Fax: 617.227.4420

Attorneys for Defendant  
St. Matthew's University, Inc.

**CERTIFICATE OF SERVICE**

I hereby certify that on April 7, 2008, I electronically filed Motion to Enlarge Time To Respond to Plaintiff's Complaint with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Barbara L. Goodwin, Esq.  
Murray Plumb & Murray  
PO Box 9785  
Portland, ME 04104-5085  
(207) 773-5651

Dated: April 7, 2008

/s/ Gail Elise Abbey

---

Christopher Silva (ME Bar No. 8934)  
Gail Elise Abbey (Of Counsel, CA Bar No. 248702)  
EDWARDS ANGELL PALMER & DODGE LLP  
111 Huntington Ave.  
Boston, MA 02199-7613  
Phone: 617.239.0100  
Fax: 617.227.4420

Attorneys for Defendant  
St. Matthew's University, Inc.